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20 July 2023

Dear Sir or Madam,

Richmond Draft Local Plan: Regulation 19 Version – June 2023

We represent Port Hampton Estates Limited who are the owners of Platt's Eyot (Site Allocation 2). We wish to make the following comments on the Publication (Regulation 19) Consultation Version published for consultation in June 2023.

Site Allocation 2: Platt's Eyot, Hampton

This relates to the specific allocation of Platt's Eyot and reflects the existing adopted policy. There are a few comments we wish to make that would ensure the allocation better reflects the existing situation on the site.

- Under existing land uses this should reflect that the site already has a cottage in residential use
- Planning history should reflect that discussions have taken place with the landowner in this section of the policy -

The Council is committed to working in partnership with the site owners and Historic England to develop a Masterplan or development brief for the island. Regeneration should maintain, and where possible enhance, existing river-dependent and river-related uses. New business and industrial uses that respect and contribute to the island's special and unique character are encouraged. Some residential development may be appropriate where it enables for the restoration of the listed buildings, especially those on the Heritage At Risk Register.

- Reference in the text to "Very limited vehicular access" does not reflect the vehicular access that exists today via a bridge from the northern bank of the Thames. This should refer to the fact that improved vehicular access for servicing will be required to support and facilitate the redevelopment of the island referred to in this allocation.

Other than these comments, we are not seeking further revisions to the Site Proposal as we consider it to be a positive framework for regeneration on the island.

We note that our comments made to the previous draft of the plan have been incorporated into the text of this allocation.

Employment Policies (Policies 21, 23 and 24)

Employment policies relevant to the island are as follows:

Policy 21. Protecting the Local Economy (Strategic Policy)

A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:

1. Protect existing employment floorspace for office and industrial use, with a no net loss approach. Take an employment-led approach to any redevelopment to meet local economic needs through intensification of the existing employment floorspace.

...

4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;

Policy 23. Office

Retention of offices

A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any redevelopment proposals are required to contribute to a net increase in office floorspace. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.

Policy 24. Industrial land

Retention of industrial space

A. There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A.

While we support the principles included in these policies, they need to take account of site specific conditions that may not enable re-provision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. This is particularly the case on sites such as Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.



River-Related Uses

Policy 40 relates to the protection of rivers and river corridors in the Borough. This includes the protection of river-dependent and river-related uses and which will apply to Platt's Eyot and future redevelopment proposals.

Policy 40. Rivers and river corridors

...

Riverside uses, including river-dependent and river-related uses

F. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. This will be achieved by:

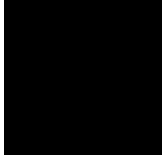
- 1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;*
- 2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to integrate and enhance the river, and be sensitive to its ecology; Increasing biodiversity and the quality of our green and blue spaces, and greening the borough*
- 3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;*
- 4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;*
- 5. requiring setting back development from river banks and existing flood defences along the River Thames*

As with the employment policies, we generally support the provisions of this policy but we consider that it needs to address the situation where site specific conditions which may preclude meeting all or some of these objectives. Alternatively, this could be addressed in the site specific text and final policy for Platt's Eyot.



We trust these representations are accepted as a formal comment to this current local plan consultation process. Should you require any further clarification do not hesitate to contact me.

Yours faithfully,



Kevin Scott BA (Hons), Dip TP, MRTPI
Managing Director

